| | |
|---|---|
| **From:** | Schindler, Jason |
| **To:** | Park, Andy |
| **Cc:** | Ferreira, Steve; "Anthony Findley"; Mark D. Fisher (mfisher@elminc.com); Ansari, Ramin; Kirby, Lisa; Ostapczuk, Eric; Devorak, Coleen; Sontag, John; Soukup, James |
| **Subject:** | RE: Hatco Quarterly Progress Report 61 |
| **Date:** | Friday, January 08, 2021 10:04:08 AM |
| **Attachments:** | 2020-05-18 Crown Relocations Hot Spot QAPP Add.pdf |

Good Morning Mr. Park,
I have inserted responses to your comments below (blue text). Please let me know if you have any additional questions.
Thanks,
Jason

Jason Schindler
Principal Project Manager
Weston Solutions, Inc.
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Edison, NJ 08837
Tel: 732-417-5804
Cell: 732-740-5529
Fax: 732-417-5801
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**From:** Park, Andy <Park.Andy@epa.gov>
**Sent:** Monday, January 4, 2021 7:03 AM
**To:** Schindler, Jason <Jason.Schindler@WestonSolutions.com>
**Cc:** Ferreira, Steve <Ferreira.Steve@epa.gov>; 'Anthony Findley' <Anthony.Findley@dep.state.nj.us>
**Subject:** RE: Hatco Quarterly Progress Report 61
**** External Email ****
Good morning,
Please respond to the following comments:

- 6.1, Third Bullet: It states that estimated 25,000 gallons of soils was shipped for off-site disposal. Cubic yards or cubic feet appears to be an appropriate unit for soils. Please confirm if the unit, gallon, is correct.

Response: The third bullet is intended to summarize the estimated 25,000 gallons of LNAPL contained within the saturated soils that were shipped off. The quantity was estimated as follows: 1,261 tons of LNAPL-saturated soil was shipped offsite for disposal during the Southeast Leg remediation project. Based on field observations Weston made the following assumptions regarding the quantity of LNAPL contained within the pore volume of that soil: The average soil density was 1.6 tons per cubic yard and the estimated soil porosity was 35%. This resulted in slightly more than 50,000 gallons of pore space. That volume was halved to estimate a conservative volume of approximately 25,000 gallons of LNAPL trapped within that pore space. Please let me know if you would like to see further clarification in the progress reports.

- 6.3: Please be specific why the samples were delayed in shipment or how they were compromised.

Response: Approximately 82 samples collected from 43 sample locations during the August sampling event were compromised by the subcontract laboratory. Some of the samples were delayed by the shipping carrier and arrived outside of the temperature preservation threshold, and some were

analyzed outside of the method holding time due to scheduling conflicts at the laboratory; including some QA/QC samples that impacted multiple other samples. The compromised samples were recollected in December 2020 and were analyzed by the subcontract laboratory without issue. It is anticipated that the results of the sampling will be validated and compiled by February. We will include this clarification in the next monthly progress report.

- 6.7: Attached please see an email from Jason Schindler of Weston to Steve Ferreira of EPA dated December 9, 2020. It clarifies that AOC-23 is "a portion of the area identified in the 2005 approval as "Off-site contaminated soils from the areas west of the site boundary…" However, its remediation work plan needs to be reviewed and concurred by EPA. Please confirm if EPA has reviewed and concurred the work plan. If not, please explain.

Response: The work plan referenced was the Draft QAPP addendum dated May 18, 2020, that was provided with the permit application shared with USEPA on August 20, 2020. I have attached a copy for your reference. The work to be completed will follow the applicable procedures described in the approved Remedial Action Work Plan Addendum 4. I apologize if the wording used in the progress report caused confusion.

Regards,

Andrew Park
Chief, Corrective Action Section
Land and Redevelopment Programs Branch
U.S. Environmental Protection Agency Region 2
290 Broadway, 25th Fl.
New York, New York 10007-1866
park.andy@epa.gov

---

**From:** Schindler, Jason <Jason.Schindler@WestonSolutions.com>
**Sent:** Tuesday, December 29, 2020 11:24 AM
**To:** Park, Andy <Park.Andy@epa.gov>; Ferreira, Steve <Ferreira.Steve@epa.gov>; 'Anthony Findley' <Anthony.Findley@dep.state.nj.us>; Mark D. Fisher (mfisher@elminc.com) <mfisher@elminc.com>; Ansari, Ramin <Ramin.Ansari@lanxess.com>; Kirby, Lisa <Lisa.Kirby@lanxess.com>; Ostapczuk, Eric <Eric.Ostapczuk@tetratech.com>; Michael DiNinno <MDininno@MCUA.com>; Venkat Puranapanda (Venkat.puranapanda@chubb.com) <Venkat.puranapanda@chubb.com>; Peachey, Bryan <Bryan.Peachey@WestonSolutions.com>; Devorak, Coleen <coleen.devorak@westonsolutions.com>; Sontag, John <John.Sontag@WestonSolutions.com>
**Subject:** Hatco Quarterly Progress Report 61

All,

Attached please find a copy of the Quarterly Progress Report for remediation activities at the Hatco site. Feel free to contact me if you have any questions.

Thanks,

Jason

Jason Schindler
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# Memorandum

**To:** Steve Ferreira, USEPA Region 2
Mark D. Fisher, LSRP, The ELM Group

**From:** Jason Schindler, Weston Solutions, Inc.

**Date:** May 18, 2020

**Re:** Quality Assurance Project Plan Addendum
Crown Relocations Hot Spot Excavation Plan
Hatco Remediation Project / Woodbridge Pond Remediation Area
Woodbridge, New Jersey

---

This memorandum and attachments serve as an addendum to the Quality Assurance Project Plan (QAPP) for the Hatco remediation project, most recently revised May 22, 2017. This addendum is intended to support the excavation of an area of off-site contamination at Hatco Area of Concern (AOC) 23 designated as "Crown Relocations Hot Spot". The property, owned by Crown Relocations (Crown), is located at 200 Mac Lane, Woodbridge, New Jersey on Block 71, Lot 6 of Woodbridge Township Tax Maps. The property is located adjacent to the Hatco Site and Woodbridge Pond. **Figure 1** shows the Site Location. **Figure 2** shows the AOCs associated with the Hatco remediation project.

The Woodbridge Pond remediation project, completed in 2019, addressed removal of contaminated sediments at Hatco AOC 24, as described in Hatco Remedial Action Workplan Addendum 4 (RAWPA 4). During the remediation of Woodbridge Pond, it became apparent that impacted material crossed onto the Crown lot located north of AOC 24. Access permission was obtained from Crown on July 2, 2019 to complete sampling on the Crown lot. Delineation sample results identified one isolated area of polychlorinated biphenyls (PCB)-impacted sediment on the Crown lot.

The Alternate Remediation Standards are specified in the approved RAWPA 4, which are 22 mg/kg (milligrams per kilogram) (dry weight basis) for bis(2-ethylhexyl)phthalate (BEHP), and 1 mg/kg (dry weight basis) for PCBs in sediment. The sediment samples collected in July 2019 to delineate the extent of contamination on the Crown lot exhibited total PCB concentrations above the remediation criterion of 1 mg/kg. There were no BEHP exceedances. Based on the resulting data one discrete area requires excavation, approximately 230 square feet by one foot deep. **Figure 3** presents the Delineation Sample Results.

The sample locations and the horizontal and vertical extent of the area of contamination to be removed are depicted on **Figure 4**. The impacted sediment is located in an area mapped as wetlands. Small trees and vegetation will be removed in order to access the planned excavation area. Sediment will be excavated using mechanical equipment, and the excavation will be

backfilled with clean fill and seeded using the same materials as approved for the Woodbridge Pond remediation permit. **Figure 5** depicts the access plan.

**Table 1** identifies the delineation samples that exceed the criteria, and the approximate dimensions and volume of the areas to be removed. Post-excavation sediment samples are summarized on **Table 2**. Dedicated, disposable sampling trowels will be used to collect samples and to place the sample material directly into laboratory-prepared sample containers. Sample collection and analysis will be performed in accordance with the protocols described in the QAPP revised May 22, 2017. Sample quantities, frequencies, analytical parameters and field quality control samples are summarized on **Table 3**.

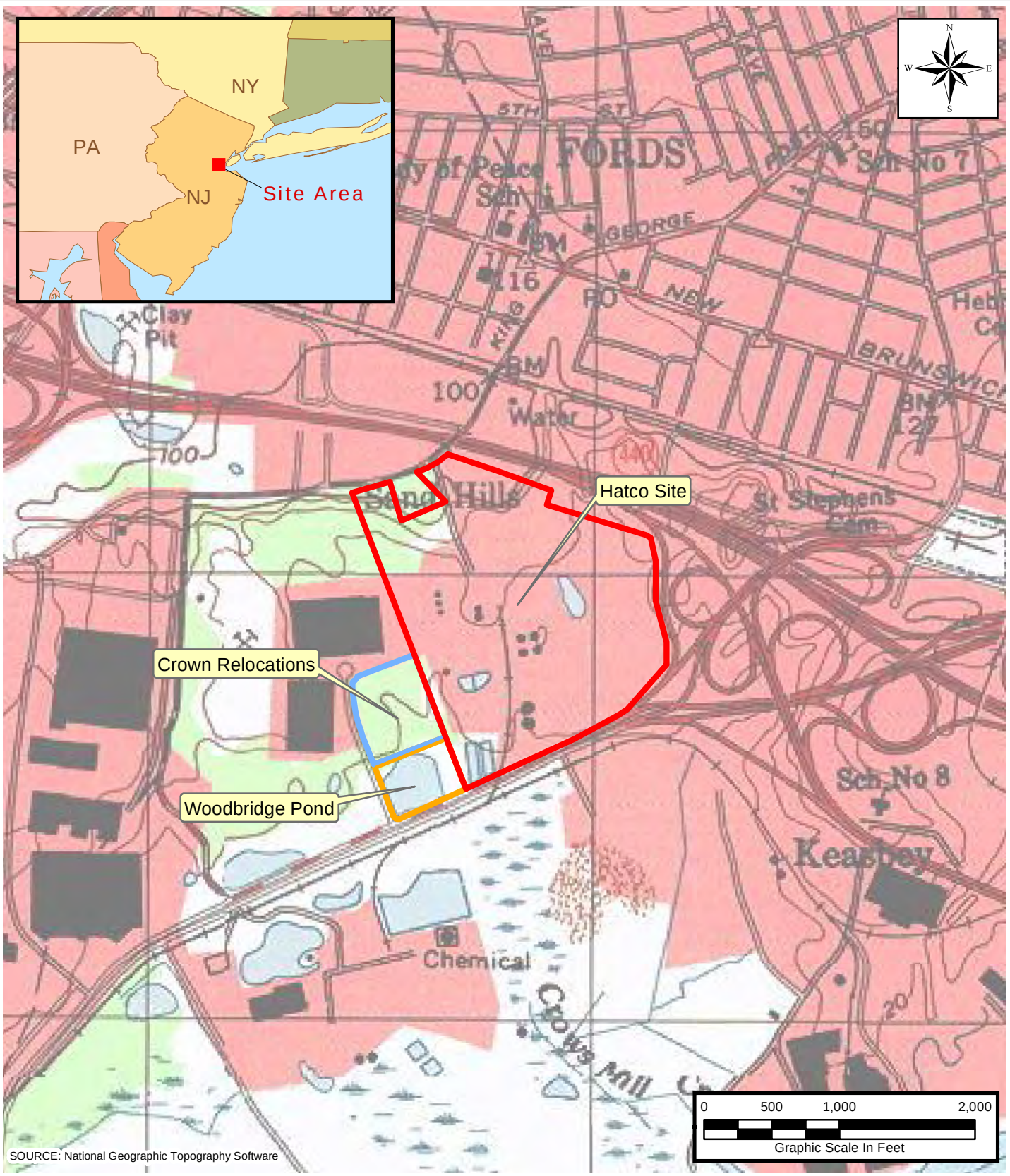
Waste generated by this project will consist of excavated contaminated sediments, root balls, personal protective equipment and spent decontamination materials. Solid waste will be disposed offsite at a licensed approved disposal facility consistent with the requirements specified in the approved RAWPA 4. Liquid waste, if any, will be managed with liquid waste from the ongoing Hatco site remediation project.

**ATTACHMENTS:**

Figure 1. Site Location Map
Figure 2. Hatco Areas of Concern
Figure 3. Woodbridge Pond Northern Sediment Delineation Samples
Figure 4: Crown Relocations Hot Spot Proposed Excavation
Figure 5: Crown Relocations Hot Spot Access
Table 1. Excavation Plan
Table 2. Post-Excavation Sampling Summary
Table 3. Quality Control Sampling Summary

# FIGURE 1:

## Site Location Map




LEGEND:

- Hatco Property
- Woodbridge Pond
- Crown Relocations

TITLE:

# Hatco Site Location Map

PROJECT: Crown Relocations Hot Spot Remediation

CLIENT NAME: Hatco Corporation

WESTON SOLUTIONS

DATE: May 2020

FIGURE #: 1

P:\Hatco\GIS\MXD\2019_05_Woodbridge_Pond_PostEx\24582_Site_Loc_Crown.mxd

# FIGURE 2:

## Hatco Areas of Concern



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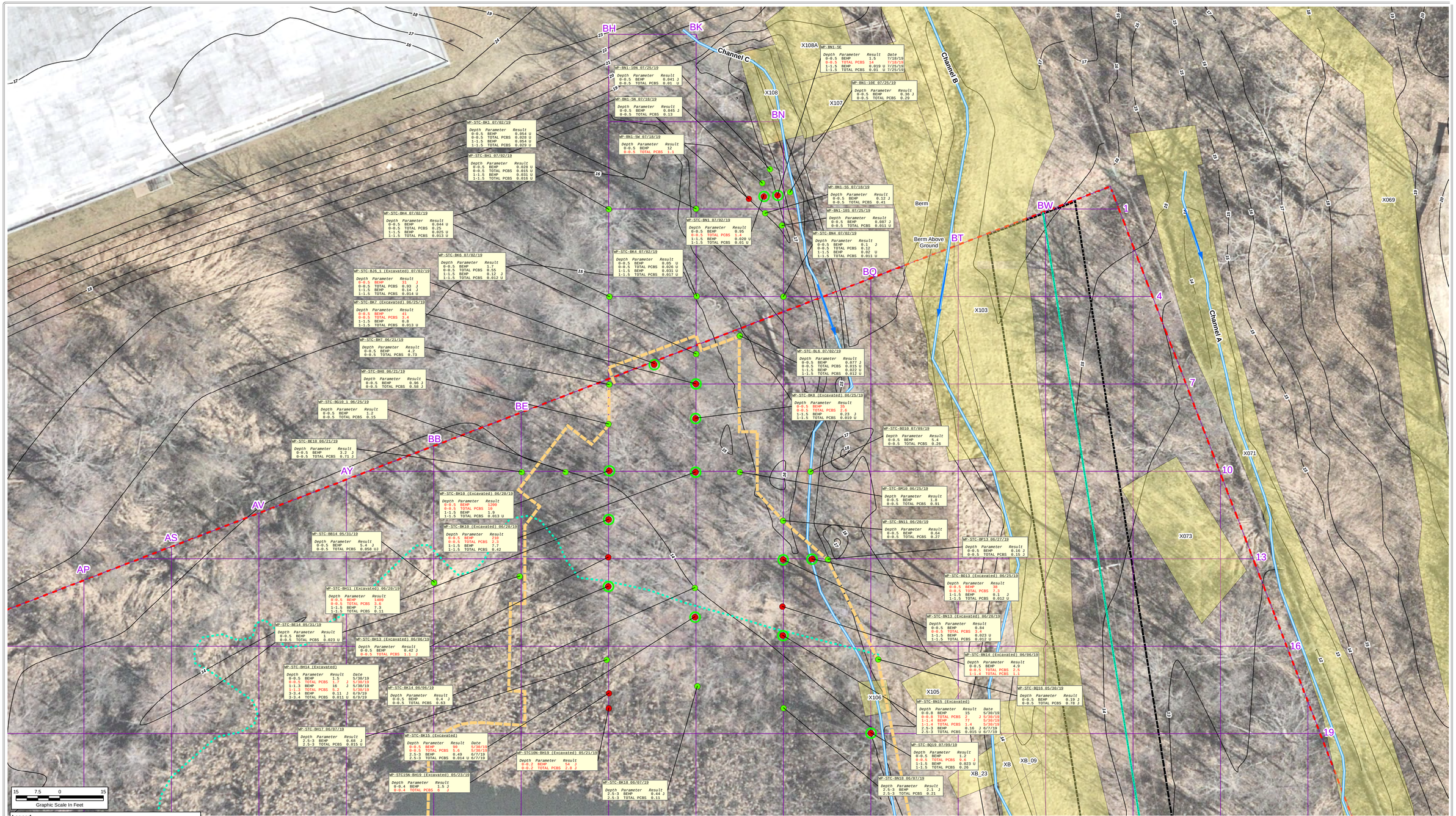
N W E S

| | | | |
|---|---|---|---|
| REPORT DATE: February 2020 | PROJECT MANAGER: J. Schindler | CLIENT NAME: Hatco Corporation | DRAWING TITLE: HATCO SITE MAP AND AREAS OF CONCERN |
| DRAWING: 25206_Areas_of_Concern_Aerial.mxd PATH: P:\Hatco\GIS\MXD\2017_02_SEL_RAPR\ | CHECKED BY: C. Devorak | | |
| REVISION No. 0 | CONTRACT No. DELIVERY ORDER NO. | PROJECT NAME: Hatco Remediation | |
| WORK ORDER No. 13067.001.004.8003 | DRAWN/MODIFIED BY: J. Gardner DATE CREATED: 2/19/2020 | | FIGURE: 2 / SCALE: 1" =80' / DATE: 2/19/2020 |

# FIGURE 3:

## Woodbridge Pond Northern Sediment Delineation Samples




Graphic Scale In Feet: 15 7.5 0 15

**Legend**

- Delineation Sample Location with Exceedance(s)
- Delineation Sample Location with no Exceedance(s)
- Vertically Delineated
- Approximate Horizontal Extent of Excavation
- Approximate Northern Limit of State Open Water
- Approximate Water Main Location
- Approximate Channel Locations
- Excavated Area
- Parcel Boundary
- Sampling Grid (30' x 30')
- Easement
- Contours (ft)

NOTES:
1. U - not detected; value shown is method detection limit.
2. J - estimated concentration.

SOURCES:
1. Aerial imagery - Nearmap (https://www.nearmap.com/us/en). Date: March 26, 2019.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N W E S

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|---|---|
| REPORT DATE: May 2020 | PROJECT MANAGER: J. Schindler |
| DRAWING: 25592_WP_North_Delin_Sampling_Crown.mxd PATH: P:\Hatco\GIS\MXD\2020_05_hOC23_Sampling\ | CHECKED BY: C. Devorak |
| REVISION No. 0 | CONTRACT No. DELIVERY ORDER NO. |
| WORK ORDER No. 13067.001.003.8036 | DRAWN/MODIFIED BY: H. Bravo-Ruiz DATE CREATED: 5/29/2020 |
| CLIENT NAME: Hatco Corporation | |
| PROJECT NAME: Crown Relocations Hot Spot | |

DRAWING TITLE: Woodbridge Pond Northern Sediment Delineation Samples

FIGURE: 3 | SCALE: 1 in = 15 ft | DATE: 3/23/2020

# FIGURE 4:

## Crown Relocations Hot Spot Proposed Excavation


## Legend

- Proposed Post-Excavation Bottom Sample Location
- Proposed Post-Excavation Sidewall Sample Location
- Soil Boring Location with Exceedance
- Soil Boring Location with No Exceedance
- Vertically Delineated
- Surface Water Flow Direction
- Current Extent of Channels B and C
- Proposed Excavation Boundary
- Parcel Boundary

NOTES:
1. All sample elevations are in feet (NAVD88).

SOURCES:
1. Nearmap Aerial Imagery. https://www.nearmap.com/us/en. Photo data June 21, 2018.
2. Parcels of Middlesex County. NJ Composite of Parcels Data with joined MOD-IV Attributes 2016, New Jersey State Plane NAD83. NJ Office of Information Technology (NJOIT), Office of Geographic Information Systems (OGIS). Publication Date: 20190822. https://njgin.state.nj.us/NJ_NJGINExplorer/


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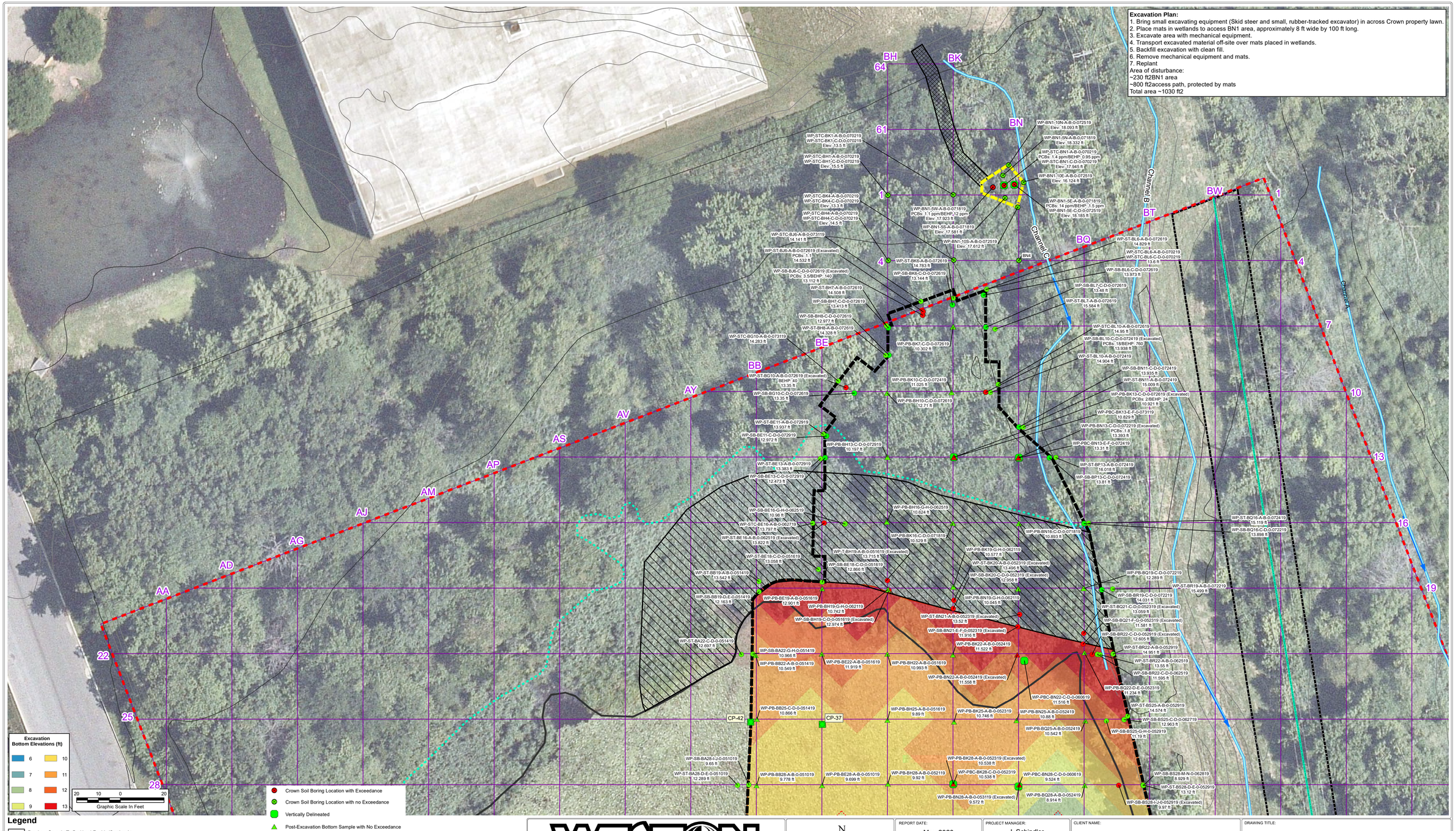
N W E S

| | | | |
|---|---|---|---|
| REPORT DATE: May 2020 | PROJECT MANAGER: J. Schindler | CLIENT NAME: Hatco Corporation | DRAWING TITLE: HATCO - AOC23 (Crown Relocations Property) Proposed Excavation |
| DRAWING: 25533_Crown_Relocation_Hot_Spot.mxd<br>PATH: P:\Hatco\GIS\MXD\2020_05_AOC23_Sampling\ | CHECKED BY: C. Devorak | | |
| REVISION No. 0 | CONTRACT No.<br>DELIVERY ORDER NO. | PROJECT NAME: Hatco Remediation | |
| WORK ORDER No. 13067.001.004.8003 | DRAWN/MODIFIED BY: J. Heaton<br>DATE CREATED: 5/18/2020 | | FIGURE: 4 / SCALE: 1 in = 5 ft / DATE: 5/18/2020 |

# FIGURE 5:

## Crown Relocations Hot Spot Access




## Legend

- CP-64 — Previous Sample To Be Used For Verification At This Location
- Parcel Boundary
- Extent of Excavation
- Sediment Area with Greater Than 50 mg/kg PCBs
- Easement
- Proposed Sampling Grid (30' x 30')
- Current Extent of Channels B and C
- Surface Water Flow Direction
- Approximate Water Main Location
- Proposed Sidewall Verification Sample Location
- Proposed Bottom Verification Sample Location
- Approximate Water Valve Location
- Crown Soil Boring Location with Exceedance
- Crown Soil Boring Location with no Exceedance
- Vertically Delineated
- Post-Excavation Bottom Sample with No Exceedance
- Post-Excavation Bottom Sample with Exceedance
- Post-Excavation Sidewall Sample with No Exceedance
- Post-Excavation Sidewall Sample with Exceedance
- Approximate Horizontal Extent of Excavation
- State Open Water Line
- Proposed Excavation Boundary
- Excavation Access Path
- Wetland Enhancement Area

NOTES:
1. Utility locations identified are based upon aerial imagery interpretation.
2. All sample elevations are in feet (NAVD88).
3. All sample elevations within Woodbridge Pond were derived from bathymetric data collected by Aqua Survey, Inc. in 2014.
4. All sample elevations outside of Woodbridge Pond were derived from 2014 LiDAR data obtained from NJ Geographic Information Network.
5. As approved by US EPA on April 6, 2016 sample locations CP-37, CP-42, CP-43, CP-44, CP-45, CP-64, and CP-64 will be used in lieu of post-excavation samples.

SOURCES:
1. New Jersey Office of Information Technology (NJOIT), Office of Geographic Information Systems (OGIS), New Jersey 2012 - 2013 High Resolution Orthophotography, NAD83 NJ State Plane Feet, NAVD Tiles. March 2013. https://njgin.state.nj.us/NJ_NJGINExplorer/
2. New Jersey Office of Information Technology, Parcels of Parcels Data with joined MOD-IV Attributes 2016, New Jersey State Plane NAD83. NJ Office of Information Technology (NJOIT), Office of Geographic Information Systems (OGIS). Publication Date: 20160720. https://njgin.state.nj.us/NJ_NJGINExplorer/

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N W E S

| | |
|---|---|
| REPORT DATE: | May 2020 |
| DRAWING: | 20583_Crown_Relocs_Hot_Spot_Access.mxd |
| PATH: | P:\Historic\GIS\MXD\2020_05_AOC23_Sampling\ |
| REVISION No. | 0 |
| WORK ORDER No. | 13067.001.003.8036 |
| PROJECT MANAGER: | J. Schindler |
| CHECKED BY: | C. Devorak |
| CONTRACT No. | |
| DELIVERY ORDER NO. | |
| DRAWN/MODIFIED BY: | H. Bravo-Ruiz |
| DATE CREATED: | 5/29/2020 |
| CLIENT NAME: | Hatco Corporation |
| PROJECT NAME: | Crown Relocations Hot Spot |
| DRAWING TITLE: | Crown Relocations Hot Spot Access |
| FIGURE: | 5 |
| SCALE: | 1 in = 20 ft |
| DATE: | 5/29/2020 |

# TABLE 1:

# Excavation Plan

Table 1. Excavation Plan
Crown Relocations Hot Spot
Hatco Remediation Project
Fords, New Jersey

| Delineation Sample Exceedances to be Removed | Sample Interval | Surveyed Elevation (ft msl) | Concentration Remaining (mg/kg) | Sediment Alternate Remediation Standard (mg/kg) |
|---|---|---|---|---|
| | (feet below grade) | | PCB | PCB |
| WP-BN1-5W-A-B-0-071819 | 0.0-0.5 | 17.9 | 1.1 | 1 |
| WP-BN1-5E-A-B-0-071819 | 0.0-0.5 | 18.2 | 14 | 1 |
| WP-STC-BN1-A-B-0-070219 | 0.0-0.5 | 17.9 | 1.4 | 1 |

Notes:
mg/kg: Concentration in milligrams per kilogram dry weight basis
PCB: Total polychlorinated biphenyls

# TABLE 2:

## Post-Excavation Sampling Summary

Table 2. Post-Excavation Sampling Summary
Crown Relocations Hot Spot Excavation
Hatco Remediation Project
Fords, New Jersey

| Post-Excavation Sample Location | Post-Excavation Sample Depth Interval (feet) | Post-Excavation Sample Identification | Parameter | X (NAD1983 - ft) | Y (NAD1983 - ft) |
|---|---|---|---|---|---|
| Bottom | 1.0-1.5 | WP-BN1-PE-C-D-0-[DATE] | PCB | 542260 | 614193 |
| Northeast Sidewall | 0.0-0.5 | WP-BN1-NE-A-B-0-[DATE] | PCB | 542263 | 614198 |
| Northwest Sidewall | 0.0-0.5 | WP-BN1-NW-A-B-0-[DATE] | PCB | 542253 | 614198 |
| Southeast Sidewall | 0.0-0.5 | WP-BN1-SE-A-B-0-[DATE] | PCB | 542265 | 614189 |
| Southwest Sidewall | 0.0-0.5 | WP-BN1-SW-A-B-0-[DATE] | PCB | 542254 | 614186 |
| West Sidewall | 0.0-0.5 | WP-BN1-We-A-B-0-[DATE] | PCB | 542247 | 614192 |

Notes:

| | |
|---|---|
| PCB | Total polychlorinated biphenyls |
| [DATE] | Six digits identifying the month (Mo), day (Da) and year (Yr) of sample collection MoDaYr |

# TABLE 3:

# Quality Control Sampling Summary

Table 3. Quality Control Sampling Summary
Crown Relocations Hot Spot Excavation
Hatco Remediation Project
Fords, New Jersey

| Matrix | Parameters | Field Samples | MS/MSD | Duplicates |
|---|---|---|---|---|
| Soil | PCB | 6 | 1 | 1 |

Notes:

PCB: Total polychlorinated biphenyls by SW-846 Method 8082
No field blank samples are required because samples will be collected using dedicated, disposable sampling tools.

Laboratory-blind duplicate samples will be collected at a frequency of one per 20 field samples
MS/MSD: Matrix spike/matrix spike duplicate samples will be collected at a frequency of one per 20 field samples

L:\13067 Hatco\12.0 Preliminary Documents\2020-04 CROWN Relocation Hot Spot\Workplan\Tables\[2020-05-18 Crown Relo Hot Spot Excavation.xlsx]Table 3 QC Samples